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MEMO ENDORSED

VIA FACSIMILE
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The Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: **Halpert Enterprises v. ABN AMRO Holdings, N.V., et al.**
Case No. 1:07-cv-05454-PKC

Dear Judge Castel:

This letter is respectfully submitted by Plaintiff Halpert Enterprises ("Plaintiff") in accordance with the Court's Individual Practices to request an extension to time to file an amended complaint in the above-entitled action. Plaintiff notes that significant factual occurrences have recently transpired, and are anticipated to occur in the very near future, related to this action that preclude Plaintiff from filing its amended complaint by tomorrow, September 7, 2007, as directed by the Court. Accordingly, Plaintiff respectfully requests that the Court grant Plaintiff an extension of time to file an amended complaint by October 19, 2007. This is the first request by Plaintiff for an extension of time to file its amended complaint. Additionally, the requested extension does not affect any other scheduled dates.

Plaintiff is a shareholder of defendant ABN AMRO Holding N.V. ("ABN AMRO" or the "Company"). This lawsuit involves an offer to purchase ABN AMRO by Barclays PLC ("Barclays") (the "Proposed Acquisition"). Plaintiff alleges that ABN AMRO and the individuals comprising the Managing and Supervisory Boards of ABN AMRO breached their fiduciary duties to the Company's shareholders by agreeing to sell ABN AMRO to Barclays for grossly inadequate compensation. In contrast to the inadequate offer from Barclays, a consortium of European banks led by The Royal

*Plaintiff's
time to file
amended complaint
extended to October 19
Conference adjourned from
September 28 to
November 2, 2007 at 10:30 a.m.
Defendant time to
answer extended
to date of
set at
conference.
SO ORDERED.
JSDT
9-6-07*

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Bank of Scotland Group plc (the "Royal Bank") has made an offer to purchase the Company for approximately \$15 billion more than Barclays' bid. It is important to note that while the offer from the Royal Bank is approximately 90% in the form of cash, the offer from Barclays is comprised of a considerable amount of Barclays stock in addition to cash. Recently, Barclays stock has been trading significantly lower than when Barclays initially made its offer for the Company. This, in turn, has widened the gap between the competing bids.

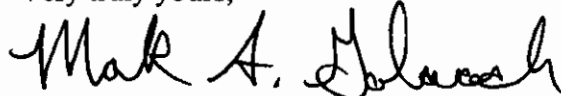
Notwithstanding the fact that Barclays is not the highest bidder for ABN AMRO, the Company has nonetheless scheduled a shareholder meeting for September 20, 2007 to allow shareholders an opportunity to discuss with the Company the two competing offers. It is also important to note that Barclays' offer period expires on October 4, 2007.

Based on the fluctuation of the circumstances surrounding this lawsuit, Plaintiff is not in a position to amend the complaint at this time. Additionally, Plaintiff is cognizant of certain defenses that arguably may be available to defendants and maintains that over the course of the next approximately four to six weeks more facts will come to light that will allow Plaintiff sufficient information to prepare a comprehensive amended complaint.

Plaintiff contacted defense counsel to request their consent to the relief requested herein.¹ Rather than consent to the requested extension, defense counsel perfunctorily indicated, without any supporting explanation, that Plaintiff should instead dismiss the case without prejudice. As Plaintiff requests only a short extension of time in which to file its amended complaint, Plaintiff is not willing to take the drastic step of dismissing the case, even without prejudice.

Thank you for your consideration of this request.

Very truly yours,



Mark A. Golovach
ROBBINS UMEDA & FINK, LLP

Counsel for Plaintiff Halpert Enterprises

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¹ On September 5, 2007, counsel for Plaintiff, Mark M. Umeda, telephoned counsel for ABN AMRO, Lawrence Portnoy, to discuss the issues presented herein. Mr. Portnoy indicated he would contact counsel for Bank of America and, thereafter, respond to Mr. Umeda's inquiry. On September 6, 2007, after not hearing back from Mr. Portnoy, counsel for Plaintiff, Mark A. Golovach, telephoned Mr. Portnoy regarding defendants' position and was told that defendants do not agree to the extension.